



**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT
(AHWMMA)**

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

L. J. Knickerbocker
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Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Hanil E Hwa Interior Systems Alabama, LLC
200 Craig Industrial Drive
Selma, Dallas County, Alabama 36702

EPA ID Number: ALR000038893
NAICS Code: 336111, 336211
Telephone: (334) 410-7122

3) Responsible Official

Mr. Chris Rossi, Human Resource Manager
Email: crossi@hanilehus.com
Website: www.seoyoneh.com/company_eng

Telephone: (334) 410-7120

4) Inspection Participants

Mr. Chris Rossi
Mr. Jimmy Robitaille, Maintenance Manager
Ms. Paula Whiting, Environmental Engineer
US Environmental Protection Agency - Region IV
Ms. L. J. Knickerbocker

5) Date of Inspection

February 25, 2016

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations.

7) Purpose of Inspection

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.



8) **Facility Description**

Hanil E Hwa Interior Systems Alabama, LLC (hereinafter “Hanil”) manufactures and paints injection molded plastic components for the Hyundai automotive plant. The production facility occupies approximately 175,000 square feet and has been in operation since 2005. The injection molding section operates 24 hours per day, seven days per week. The paint line and assembly sections work 24 hours per day, six days per week. Hanil employs 360 people; of these, only two or three employees manage hazardous waste during the performance of their job duties.

For a full description of the site and its history, refer to the June 18, 2008 compliance evaluation inspection (CEI) report (“30267 ALR000038893 047 20080627 HWTM Hanil E Hwa-TR”) in eFile at <http://app.adem.alabama.gov/eFile/>.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated January 12, 2016) Hanil identified itself as a large quantity generator of ignitable (D001) hazardous waste.

Observations

On February 25, 2016, Ms. Whiting and I (hereinafter “we” or “us”) arrived at the site at 2:00 p.m. and proceeded to the lobby area, where we met Mr. Rossi. We introduced ourselves and explained the purpose of our visit, then proceeded to a conference room where we were joined by Mr. Robitaille. We held the opening meeting and they provided background information about the site and an overview of its operations. Mr. Rossi explained that Nicole Adams, Hanil’s Safety Specialist, was out of the office for several days and that he had only been employed by Hanil since January. See Photograph #1 for an overview of the facility.

Following the opening meeting, the facility representatives guided us on the walk-through inspection of the site. During the walk-through inspection, we noted the following:

Injection Molding

In this area, raw plastic material is fed into the injection molding machines to produce a variety of automotive trim panels. Scrap plastic is collected and reintroduced to the molding process. No hazardous waste is generated in this area under normal conditions and no issues were noted.

Paint Area

In this area, the upper trim of each door panel is painted to match the specified color code. Solvent and paint wastes are generated when the paint guns are purged between color batches. At the time of the inspection, there was one 55-gallon close-top satellite accumulation container staged in the product area to receive the purged solvent. This drum was equipped with a latching funnel screwed into the bung. The drum was closed, but it was not marked or labeled in any way. See Photograph #2.

Hazardous Waste Storage Area (“HWSA”)

The HWSA is a small concrete block building located at the northwest end of the access road that runs along the rear of the main facility. The entrance to the HWSA is closed by a locked personnel gate. A paper sign with the legend “Danger – Hazardous Waste Storage Area – Unauthorized Persons Keep Out” was affixed to the gate. Inside the HWSA, there were two 55-gallon close-top drums, which Mr. Rossi said held paint waste. The drums were closed and appeared to be in good condition but were not labeled with the words “Hazardous Waste”, the applicable EPA hazardous waste numbers or an accumulation start date. The floor of the HWSA appeared to be uncoated concrete; at least one crack was visible. See Photographs #3 and #4.

Laydown Area



The Laydown Area stretches along the access road from the HWSA until the mid-point of the main facility. This area is used to accumulate a wide variety of materials, including non-hazardous paint sludge, used oil, unneeded parts racks, and assorted discarded items. In most cases, the facility representatives were not able to state how long the various materials had been accumulated and whether or not the materials were still useable.

Immediately south of the HWSA, we observed a roll-off container of water-based paint sludge. Per Mr. Rossi, the paint sludge is nonhazardous waste. A sign on the roll-off container warned employees not to place any other material in the container. See Photographs #5 and #6.

On a spill pallet beside the roll-off container, there was an open-top 55-gallon drum that held 12 discarded, intact aerosol cans of "Per-Fix Flaw Repair Coating 7205AA". Upon testing, some of the cans still held dispensable product. According to the Safety Data Sheet, the product includes three components that are U-listed hazardous wastes when discarded: ethyl acetate (EPA hazardous waste number U112); xylene (U239); and toluene (U220). The drum was open, unmarked, and very rusty. There were dozens of aerosol can caps on the ground beside the spill pallet and in the spill pallet itself. Neither facility representative was able to tell us how Hanil manages the aerosol cans or their contents. See Photographs #7 through #9.

Behind the drum holding the aerosol cans, there were two more open-top 55-gallon drums; these drums were closed. Facility representatives were unsure of their contents. Upon opening, both drums appeared to hold used oil; one drum also held seventeen additional aerosol container caps. One drum was not marked in any way; on the other drum, the spray painted letters "WA" and "O" were visible, but the area was too crowded to ascertain the rest of the markings. The drum lids were secured with clamping rings. See Photographs #10 and #11.

One fluorescent light fixture and five bent high intensity discharge (HID) light fixtures had been discarded in this area. The fixtures were stored with no protection from the weather. The facility representatives were not sure if the fluorescent fixture was useable; however, they stated the HID fixtures could not be used because of their bent metal bodies. See Photograph #12.

A few feet to the south of the light fixtures, we saw three 1-gallon cans of "Quick Dry Enamel" paint that were stored out of doors with no protection from the weather or temperature extremes; two of the cans had rusted lids. The content of at least one can seemed to have solidified. The facility representatives were not sure if the other two cans were usable product or waste. See Photograph #13.

Staged near the aforementioned paint cans, there were five additional 55-gallon drums; three drums were open-top, while two drums were close-top. All drums were closed, but there was some oily staining visible at the base of the two close-top drums. Upon investigation, all were found to contain used oil. None were marked with the words "Used Oil". The drums all appeared to be structurally sound, but the lid of one close-top drum appeared to be somewhat rusted. See Photographs #14 and #15.

In this same area, we observed two fluorescent lamps that had been placed in a trash can along with discarded plastic film. Again, the facility representatives were not sure if these lamps were usable or discarded. See Photograph #16.

Discarded Construction Material

In the field behind the Laydown Area, there was a large pile of discarded construction materials, including weathered and broken sheets of oriented strand board plywood (chip-board), 2x4 lumber, and sheets of foil vapor barrier. In addition, we saw one discarded aerosol can of lacquer paint among the debris. The facility representative were not able to say when the material had been deposited or when it would be removed. See Photographs #17 through #20.

Maintenance Shop



In this area, parts stands and other equipment used throughout the facility are repaired and/or painted. In the area immediately outside the Maintenance Shop, between the welding table and the wall, there were, at least, two dozen fluorescent lamps in a plastic trash container. Mr. Robitaille said they had been kept there since, at least, December [2015] and that he thought some of them were still useable. Inside the Maintenance Shop, we found one damaged HID light fixture with the remnants of a broken lamp and an open 1-gallon can of enamel paint; the can was about half full and the contents had solidified. See Photographs #21 through #23.

Electrical Room

Spent fluorescent lamps and other lighting wastes are stored in the Electrical Room, which is adjacent to the Maintenance Shop. At least, 15 spent fluorescent lamps were protruding from the top of a corrugated cardboard box of filters. The box was not closed, dated or marked with the words "Universal Waste" or "Hazardous Waste". We also saw three HID light fixtures in this area; these appeared to be intact, and two still held intact lamps. Mr. Rossi and Mr. Robitaille were not sure if they were still useable or if they had been discarded. See Photographs #24 and #25.

Records Review

During the records review, we requested the following documents and records:

- Job titles and job descriptions for all HW workers – with the names of employees filling each job;
- Written description of the HW management and emergency response training program;
- Training requirements for all HW management-related jobs;
- Documentation of initial HW management training and annual refresher/update;
- Written Waste Minimization plan;
- Contingency plan;
- Documentation of arrangements with police, fire, and emergency responders;
- Notice to local hospitals;
- Notice to local branch of ADEM's Field Operations Division
- Hazardous Waste (HW) manifests;
- Land disposal restriction notices;
- Hazardous waste determination;
- Documentation of monthly hazardous waste generation ;
- Weekly HW storage area inspection logs; and
- Any other required inspection logs

Facility representatives could not locate the following documents:

- Written job titles and job descriptions for all hazardous waste workers;
- A written description of the hazardous waste management and emergency response training programs;
- A list of the training requirements for all hazardous waste management-related jobs;
- A written waste minimization plan.

From the documents available, Hanil has not provided any form of hazardous waste or emergency response training to its workers that manage or handle hazardous waste since November 7, 2012. There were no documents to demonstrate that the facility maintenance manager and the two emergency coordinators had ever received hazardous waste management training of any sort.

The site's "Emergency Action Plan" does not meet the requirements for a Contingency Plan as outlined in Division 14:



- The plan does not address explosions or releases in any way and provides little guidance for fires
- The plan did not describe emergency actions to be taken by personnel aside from evacuation to a rally point
- The plan did not describe arrangements with local law enforcement, fire departments, hospitals, contractors, & State & local emergency response teams
- The plan did not list the office address and home address of the emergency coordinator and any alternates
- The plan did not list, describe, and give the location of emergency and decontamination equipment at the facility
- The plan did not include an evacuation plan for facility personnel
- The facility could not document that the plan was submitted to local law & fire departments, hospitals, emergency response teams (also State ERTs)
- A trained, qualified emergency coordinator was not on-site during the inspection. The plan designates Mr. Rossi as the alternate emergency coordinator; he was not aware of that designation, was not familiar with the contingency plan, and had not received any form of hazardous waste or emergency response training

The hazardous waste storage areas inspection logs did not accurately reflect the amount of hazardous waste stored at the site:

- Weekly inspections were not conducted during shut-down periods
- The weekly inspection conducted on December 18, 2014, recorded a total of 15 containers/825 gallons of hazardous waste in storage; the next inspection, dated December 23, 2014, recorded 0 containers/0 gallons of hazardous waste in storage. Hazardous Waste Manifest #004267642SKS, dated December 23, 2014, recorded that 16 drums of waste paint (EPA hazardous waste numbers F003, F005, D001, D005, D006, and D007) were shipped off site. Hazardous Waste Manifest #004267682SKS, dated January 2, 2015, shows a further 67 drums of waste paint related material (F003, F005, D001, D010) shipped off-site
- The weekly inspection dated February 17, 2016 (the last weekly inspection recorded before our site visit), recorded eleven containers/ 605 gallons of hazardous waste in storage. Our inspection of the hazardous waste storage area revealed only two 55-gallon containers

Hanil's most recent 8700-12 and biennial report indicate that the facility generates only ignitable (D001) hazardous waste. Our inspection revealed Hanil has generated seven 55-gallon drums of used oil and the abovementioned manifests included additional toxicity characteristic codes as well as two non-specific sources listed codes.

9) **Summary**

Based on observations made at the time of the inspection, Hanil appears to be a large quantity generator and a used oil handler. The following possible noncompliant items were noted at the time of the inspection:

- One 55-gallon container of paint and solvent waste in the paint area was not marked or labeled in any way
- Two 55-gallon close-top drums in the hazardous waste storage area were not labeled with the words "Hazardous Waste", the EPA hazardous waste numbers, or an accumulation start date.
- In the Laydown Area we discovered the following issues:
- One 55-gallon drum containing 12 intact aerosol cans was open, unmarked, and in poor condition
- Seven 55-gallon drums of used oil were not marked with the words "Used Oil"



- Employees have not remediated a release of used oil to the ground
- Hanil has not made a hazardous waste determination on the following items:
- One fluorescent light fixture, two fluorescent lamps, five HID light fixtures, and three cans of enamel paint in the laydown area; a pile of discarded construction material and a discarded aerosol can of lacquer paint behind the laydown area; two dozen fluorescent lamps staged outside the maintenance shop; one can of enamel paint in the maintenance shop; and three HID light fixtures in the electrical room
- In the electrical room, at least fifteen spent fluorescent lamps were protruding from the top of a corrugated cardboard box of filters. The box was not closed, dated, or marked with the words "Universal Waste" or "Hazardous Waste".
- Facility representatives could not locate all requested documents
- The site's "Emergency Action Plan" does not meet the requirements for a Contingency Plan
- The hazardous waste storage areas inspection logs do not accurately reflect the amount of hazardous waste stored at the site
- Hanil's most recent 8700-12 and biennial report do not accurately reflect all hazardous wastes generated at the site

Following the inspection, we met with Mr. Rossi and Mr. Robitaille for a closing meeting. We reviewed our observations, and gave them the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing our findings. I left the top copy of the form with Mr. Rossi and we departed the site at 5:15 p.m.

10) **Signed**

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

April 11, 2016

Date

11) **Concurrence**

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

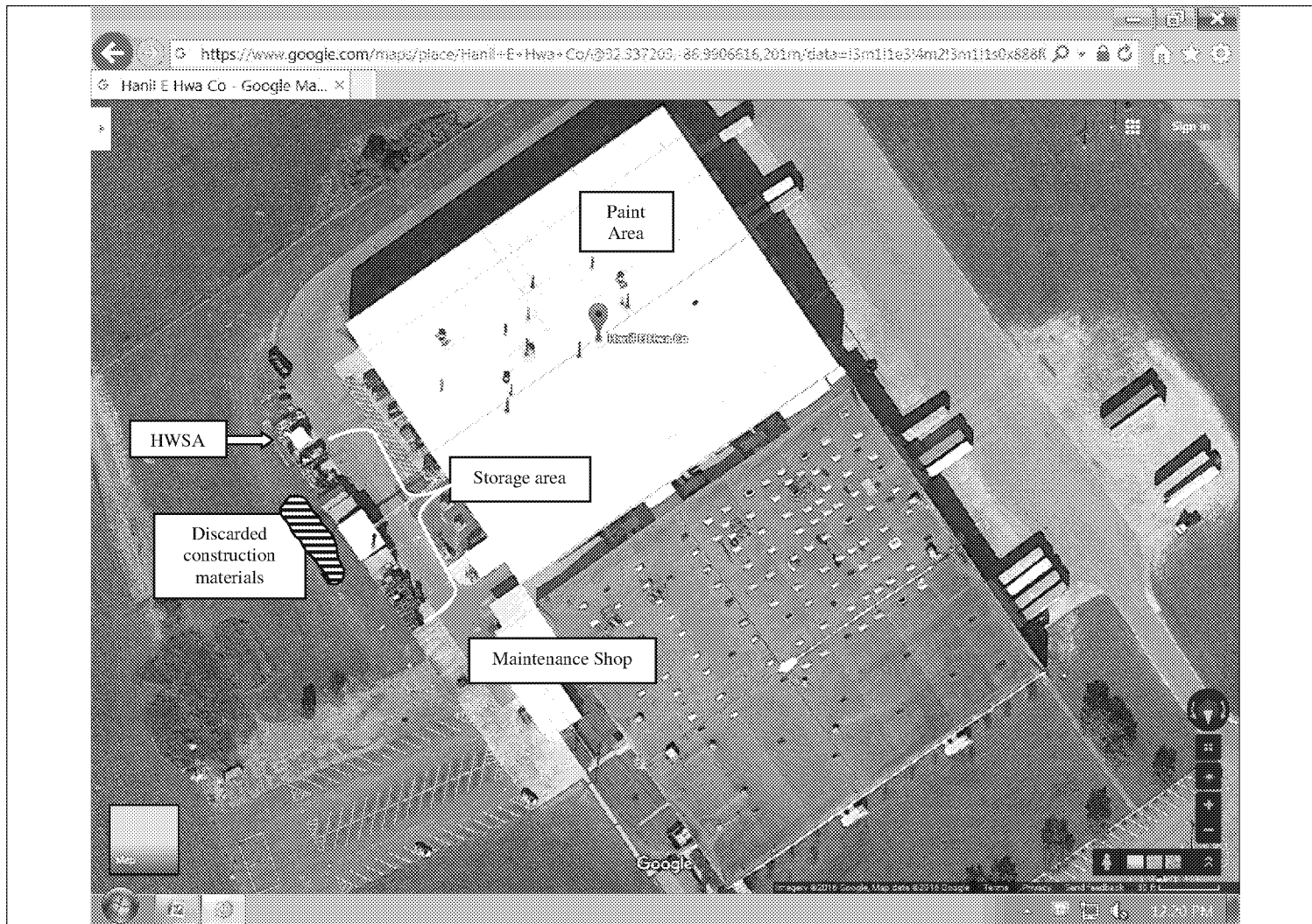
April 11, 2016

Date

Attachment - Photo Log

30267 ALR000038893 047 20160411 HWTM CEI Report

ATTACHMENT – HANIL E HWA INTERIOR SYSTEMS ALABAMA PHOTO LOG



1. Google Maps view of site



2. Paint Shop – unmarked SAA container



3. 90-day accumulation area



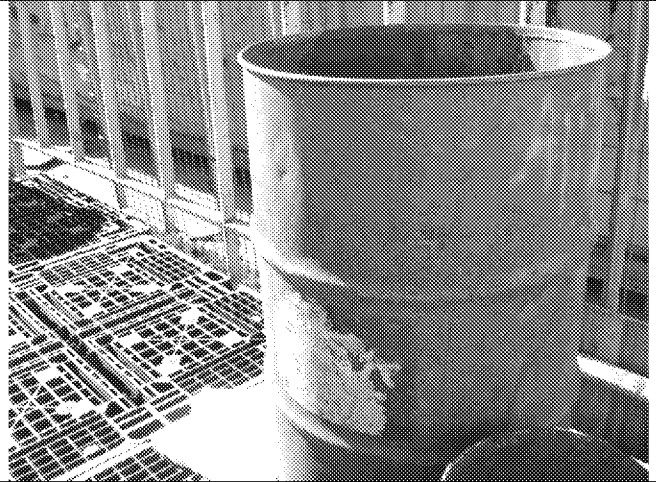
4. HW Storage – unlabeled, undated drums



5. Sign on paint sludge roll off



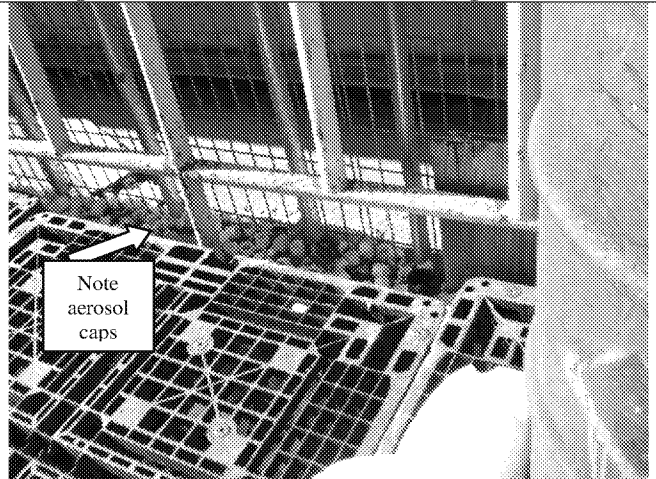
6. Contents of paint sludge roll off



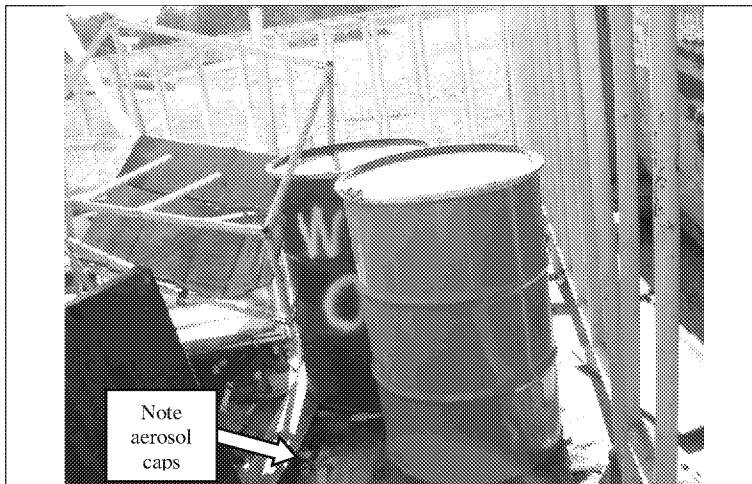
7. Open, unmarked drum containing spent aerosols



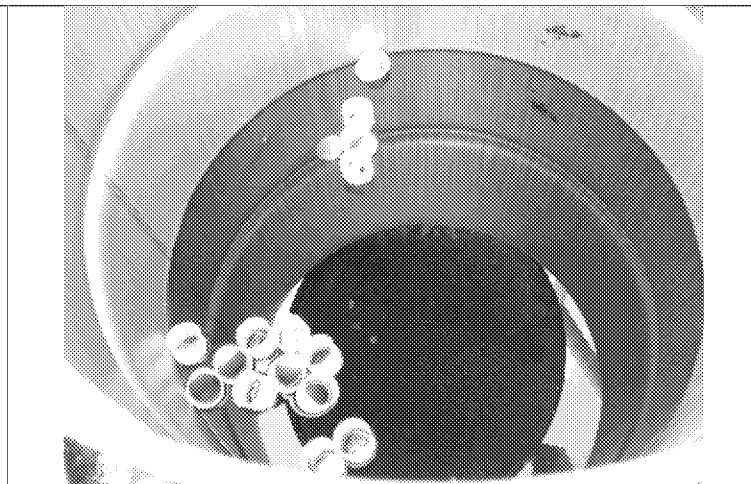
8. Drum containing spent aerosols



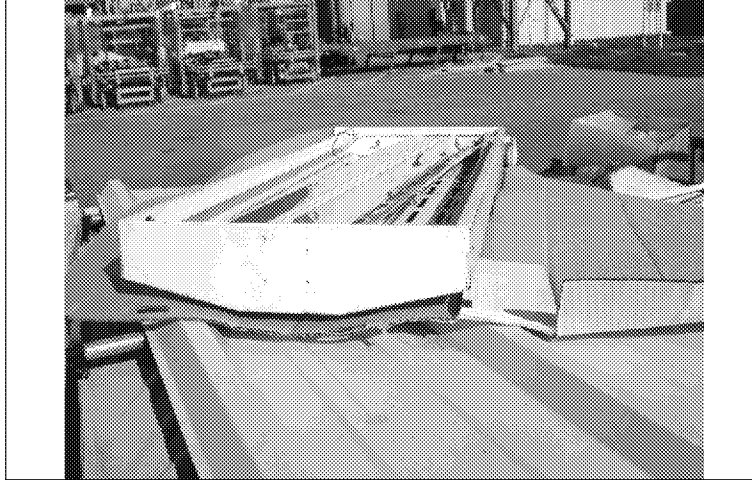
9. Discarded caps from aerosol cans



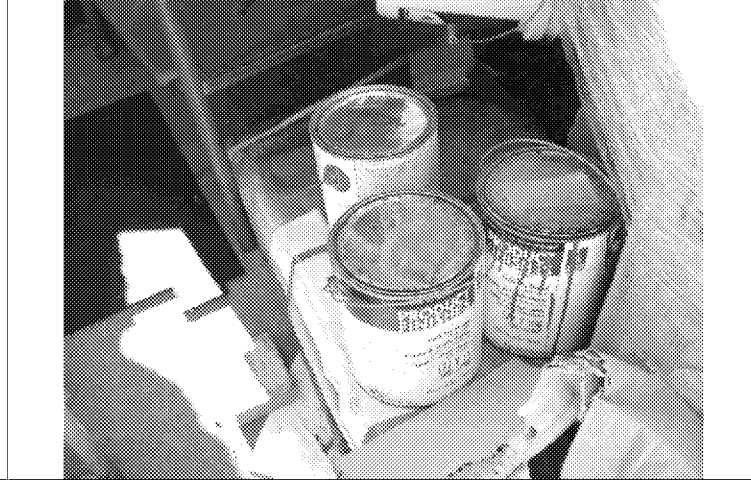
10. Unmarked or improperly marked UO drums



11. Used oil and discarded caps from aerosols



12. Discarded fluorescent fixture



13. Discarded paint



14. Three unmarked used oil drums; note staining at base



15. Unmarked drum holding used oil



16. Fluorescent lamps



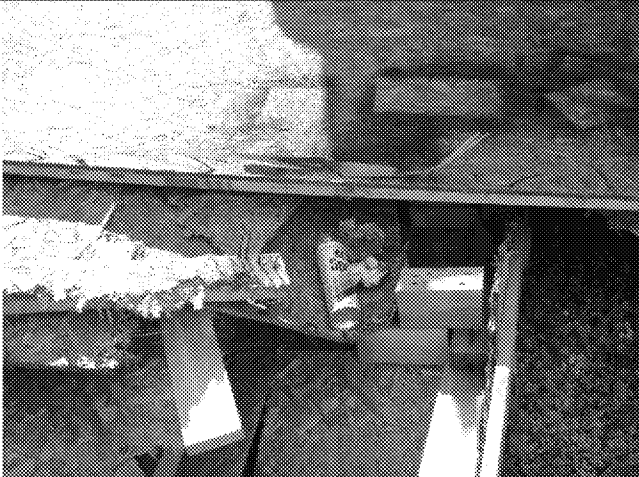
17. Construction material dump



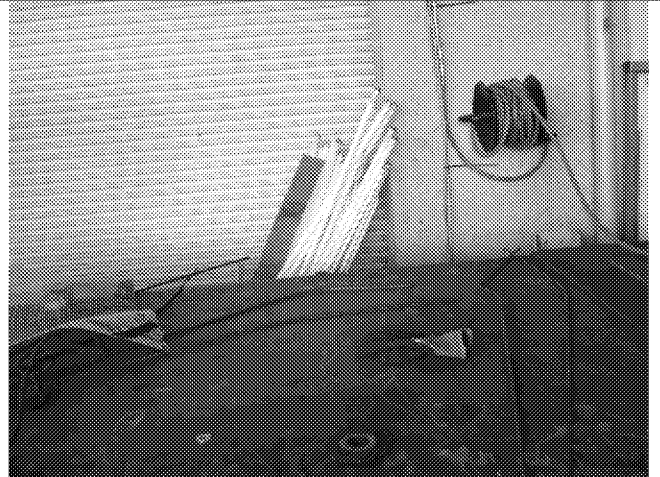
18. Construction material dump



19. Construction dump



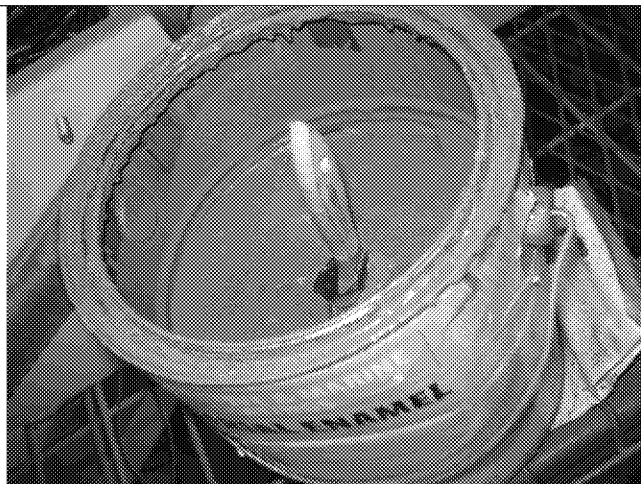
20. Construction dump – note discarded aerosol can



21. Fluorescent lamps “stored” outside maintenance shop



22. HID lamp broken in fixture



23. Solidified enamel paint



24. Spent fluorescent lamps stored in box containing filters



25. Close up of spent lamps